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PAGE 1 / 1

October 4, 2012

Brian Jones
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Response to your September 4, 2012 Inquiry concerning June 2012 Monthly Report,
covering May 1, 2012 ? May 31, 2012

Dear Mr. Jones:

Your correspondence to Kevin Allen, Treasurer, Citizens United Political Victory Fund (?CU-PVF?), has been directed to me for response. In your letter you indicate that the June 2012 monthly reported filed by CU-PVF suggests that CU-PVF may have failed to file a required 48-hour report for an independent expenditure during the reporting period. CU-PVF?s records confirm that a 48-hour report for \$20,000.00 in television advertisements in the special election for Arizona?s second congressional district was filed late. This transgression was self-reported by CU-PVF in a notation to the late-filed 48-hour report, which was filed on June 19, 2012.

CU-PVF regrets that late filing of the report. The committee has made a number of independent expenditures over the years and has consistently filed timely disclosure reports. The committee filed a timely report on May 17, 2012 when it made its initial purchase of \$100,000.00 in advertising for the election at issue here, but failed to file a timely subsequent report when it purchased an additional \$20,000.00 in advertising on May 23, 2012. The late filing was the result of staff oversight. The individuals responsible have been admonished for their mistake and we do not expect a repeat in the future.

Please feel free to contact me if you should have any further questions regarding this matter. Thank you.

Sincerely,

Michael Boos
Citizens United Vice President
& General Counsel

cc: Kevin Allen, Treasurer, CU-PVF
